

**BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA**

In Re: Application of Time Warner Cable Information)	Docket No. 2008-325-C
Services (South Carolina) LLC, d/b/a Time)	
Warner Cable to Amend its Certificate of Public)	
Convenience and Necessity to Provide)	
Telephone Services in the Service Area of)	
Farmers Telephone Cooperative, Inc. and)	
for Alternative Regulation)	
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In Re: Application of Time Warner Cable Information)	Docket No. 2008-326-C
Services (South Carolina) LLC, d/b/a Time)	
Warner Cable to Amend its Certificate of Public)	
Convenience and Necessity to Provide)	
Telephone Services in the Service Area of)	
Fort Mill Telephone Company, d/b/a Comporium)	
Communications, and for Alternative Regulation)	
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PBT Telecom, Inc. and for Alternative Regulation)	
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St. Stephen Telephone Co., Inc. and)	
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**TIME WARNER CABLE'S RETURN TO RLECs'
MOTION TO CONSOLIDATE**

Time Warner Cable Information Services (South Carolina), LLC d/b/a Time Warner Cable ("TWCIS") submits this return to the motion to consolidate filed by Farmers Telephone Cooperative, Inc., Fort Mill Telephone Company, d/b/a Comporium Communications, Home Telephone Company, Inc., PBT Telecom, Inc., Rock Hill Telephone Company, d/b/a Comporium Communications, and St. Stephen Telephone Company, Inc. (collectively "RLECs"). TWCIS submits that the RLECs' motion to consolidate should be held in abeyance until after all testimony is filed in this case. Whether and to what extent consolidation will be appropriate will depend on what issues will be raised in these cases.

Although, in principle, TWCIS would have no objection to consolidation of these cases, it would be premature to order such a consolidation at this time, before the RLECs have made clear the arguments they intend to make and the issues they intend to raise in the various cases. Certain issues that may be raised by the intervening RLECs would require a focus on the specific geographical areas served by the different RLECs, thereby making consolidation inappropriate. For instance, if the individual RLECs allege that they will somehow be negatively affected by TWCIS' proposed competitive entry into their service areas, then it will be necessary for separate records to be compiled for each TWCIS application. In that case, TWCIS would oppose

the motion to consolidate. If those issues are not raised by the RLECs, it may be appropriate to consolidate these cases or to avoid duplicative testimony by agreeing that the testimony of certain witnesses can be included in the records of all cases. Until the RLECs file their testimony or otherwise make clear what their positions will be in connection with the pending applications, however, it would be premature to make any decisions regarding consolidation of the proceedings and records. Accordingly, TWCIS submits that the motion to consolidate should be held in abeyance until all testimony has been filed.


Dated this 11th day of November, 2008.

Respectfully submitted,

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Services, (South Carolina), LLC

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CERTIFICATE OF SERVICE

This is to certify that I, Leslie Allen, a legal assistant with the law firm of Robinson, McFadden & Moore, P.C., have this day caused to be served upon the person(s) named below **Time Warner Cable Information Services (South Carolina) LLC's Return to RLECs' Motion to Consolidate** in the foregoing matter by causing a copy of same in the U.S. Mail in envelopes address as follows:

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Margaret M. Fox, Esquire
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Nanette S. Edwards, Esquire
Jeffrey M. Nelson, Esquire
Office of Regulatory Staff
P.O. Box 11263
Columbia, SC 29211

Dated at Columbia, South Carolina this 11th day of November, 2008.



Leslie Allen